

DOCKET SECTION

BEFORE THE

POSTAL RATE COMMISSION
WASHINGTON, DC 20268-0001

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY
Docket No. R97-1

POSTAL RATE AND FEE CHANGES, 1997

DOUGLAS F. CARLSON
FOLLOW-UP INTERROGATORIES
TO UNITED STATES POSTAL SERVICE
WITNESS JOE ALEXANDROVICH
(DFC/USPS-T5-11-15)

October 14, 1997

Pursuant to sections 25 and 26 of the *Rules of Practice* and section 2(D) of the *Special Rules of Practice*, I, Douglas F. Carlson, hereby submit follow-up interrogatories to United States Postal Service witness Joe Alexandrovich. My first opportunity to review the previous responses was on October 6, 1997, in Washington, DC. Per section 2(D) of the *Special Rules of Practice* and section 15 of the *Rules of Practice*, these follow-up interrogatories are timely.

If the witness is unable to provide a complete, responsive answer to a question, I request that the witness redirect the question to a witness who can provide a complete, responsive answer. Otherwise, I request that the question be redirected to the Postal Service for an institutional response.

The instructions contained in my interrogatories to witness Fronk (DFC/USPS-T32-1-7) are incorporated herein by reference.

Respectfully submitted,



DOUGLAS F. CARLSON

Dated: October 14, 1997

For interrogatories DFC/USPS-T5-11–15, the term “other cards” refers to private post cards and agency cards.

DFC/USPS-T5-11. Please refer to your response to DFC/USPS-T5-5(c).

a. If necessary, could the Postal Service, using a reasonable expenditure of time and resources, train IOCS data collectors to distinguish between stamped cards and other cards? Please answer to the best of your knowledge. If your answer is anything other than an unqualified yes, please explain your answer fully.

b. Using a reasonable expenditure of time and resources, is the Postal Service unable to train IOCS data collectors to distinguish between stamped cards and other cards? Please answer to the best of your knowledge. If your answer is anything other than an unqualified no, please explain your answer fully.

c. Please define “other agency cards.”

DFC/USPS-T5-12. Please refer to your response to DFC/USPS-T5-5(d). Please confirm that no studies or other analyses have concluded that the reliability of the cost data for postal cards that you presented in Attachment 1 to Response to DFC/USPS-T5-2(b) has been affected in any significant way by the misidentification of stamped cards and other cards by IOCS data collectors. If you do not confirm, please explain fully and provide relevant documents.

DFC/USPS-T5-13. Please refer to your response to DFC/USPS-T5-9(b).

a. Please confirm that errors in properly coding stamped cards, private post cards, and other agency cards might have caused the attributable cost for stamped cards that you provided in Attachment 1 to Response to DFC/USPS-T5-2(b) to be overstated. If you do not confirm this possibility, please explain fully and provide copies of relevant documents or studies.

b. Please confirm that errors in properly coding stamped cards, private post cards, and other agency cards might have caused the attributable cost for private post cards that you provided in Attachment 1 to Response to DFC/USPS-T5-2(b) to be

understated. If you do not confirm this possibility, please explain fully and provide copies of relevant documents or studies.

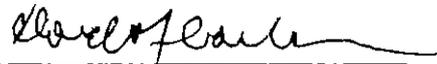
DFC/USPS-T5-14. Please answer DFC/USPS-T5-9(c) using the definition of "public interest" that the Postal Service used when it determined, under 39 U.S.C. § 3622(a), that a stamped-card fee would be in the public interest.

DFC/USPS-T5-15. Please refer to Attachment 1 to DFC/USPS-T5-15. This attachment depicts four cards, numbered one through four. Assume that these cards are consistent with the requirements of DMM § C100.2.1 and any other applicable regulations defining a First-Class Mail card. (Note that the image of each card has been reduced so that the four cards will fit on one sheet of paper.)

For each card, please state, to the best of your ability, whether the card is (i) a stamped card or (ii) a private post card. To the extent that you have doubt about the categorization of each card, please provide your best determination and specify the factors that prevent you from making a definitive determination or the additional information that you would need to make a definitive determination.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon the required participants of record in accordance with section 12 of the *Rules of Practice* and sections 3(B) and 3(C) of the *Special Rules of Practice*.



DOUGLAS F. CARLSON

October 14, 1997
Emeryville, California

(Upper) Color spectacular along Blue Ridge Parkway (Mid) die(L) Street over peaks of Otter (Middle R) Autumn at Pineda Lake (Lower) Mail post - 181 autumn along the Parkway



#1
(Actual size: 4" x 6")

Nashville TN 372

8-11-97

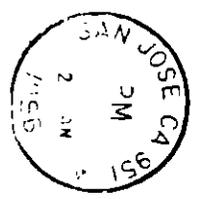
© Put by Arndt Photography Services, Inc.
2511 South First St. #200, Raleigh, NC 27603 704-333-5143



#2

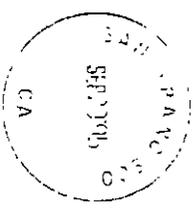
(Actual size: 3 1/2" x 5 1/2")

Doug Carlson
PO Box 7868
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Berkeley CA 94712-3574

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#3
(Actual size: 4" x 6")

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#4

(Actual size: 4" x 6")

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